

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

CHIDI N. ANUNKA

Case No. 3:20-cv-06252-BHS

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

AMAZON SERVICE INTERNATIONAL, INC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Chidi N. Anunka
Street Address	7401 Central Avenue, P.O. Box 14597
City and County	Minneapolis
State and Zip Code	Minnesota 55414-0597
Telephone Number	612/300-4422
E-mail Address	chidson@att.net

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Amazon Service International, Inc.
Job or Title <i>(if known)</i>	Corporate Service Company
Street Address	300 Deschute Way SW, Suite 3
City and County	Tumwater
State and Zip Code	Washington 98501
Telephone Number	360 725 0377
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐

Federal question

☒

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Chidi N. Anunka, is a citizen of the
State of *(name)* Minnesota.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* Amazon Service International, Inc., is incorporated under the laws of the State of *(name)* Washington, and has its principal place of business in the State of *(name)* Washington.
Or is incorporated under the laws of *(foreign nation)* _____,
and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$2,500,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see attached

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Please see attached

III Statement of Claim

Plaintiff did not understand denying the offer to help in operation department, dept of origin. August 13th, 2019, following four years in Operation department, plaintiff was given internal transferred to logistic department as a driver. Shortly after orientation with logistic department driving work was outsourced, management gave no reason for outsourcing work, the outsourced left driver with nothing to do in a 10hr. shift Plaintiff offered to help in Operation dept. until needed to drive truck, defendant declined with a counteroffer to provide computer training in substitution to work outsourced, the counteroffer did not come through. On Dec. 26th, 2019 end of peak/season came termination that left plaintiff confused with the outsourcing of work, offer to help in dept. of origin declined and the defendant computer training in substitution of outsourced never came through but shortly after termination was promotion of young.

IV Relief

Plaintiff as a day one associate at MSP5; first Amazon in Minnesota launched August 2nd 2015, Shakopee, MN. Associates then were charged with responsibilities to work hard, make history help the company sustained in the State. Plaintiff delivered through work performance, training Associates, good attendance also helped in other facilities during launching. Shortly after Aug. 2015 other facilities were launched across the State, the hard work and good performance paved the way for launching more facilities. Termination not because of performance or attendance but the obsession to promote young and deprive work seniority plaintiff held over everyone across facilities, added to outstanding work record. The discrimination left plaintiff very confused; plaintiff did the work ask of him, deliver result.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/15/2020

Signature of Plaintiff

Printed Name of Plaintiff

Chidi N. Anunka

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

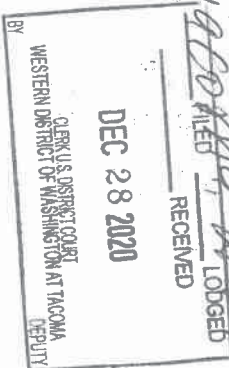
State and Zip Code

Telephone Number

E-mail Address

Chidi N. Amunke
P.O. Box 14597
Minneapolis, MN 55414-0597

US District Courthouse
Union Station Courthouse
1717 Pacific Avenue, Rm. 3100
Tacoma Washington, 98449-3200



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